

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re: Paul P Tadder

Case No: 13-20574

Debtor

Chapter 13

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**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

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PLEASE TAKE NOTICE that the Debtor, Paul P Tadder, has filed papers with the Court requesting modification of his Chapter 13 Plan in the above-entitled case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for a hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk of Bankruptcy Court  
517 East Wisconsin Avenue  
Room 126  
Milwaukee, WI 53202-4581

If you mail your request to the court for filing, you must mail it early enough so that the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Servantez Law Office, S.C.  
Attorney At Law  
4101 Washington Avenue  
Racine, WI 53405

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

## REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponent of this modification is:

  X   The Debtor;  
       The Chapter 13 Trustee (post-confirmation modifications only);  
       The holder of an unsecured claim (post-confirmation modification only).

2. This is a request to modify a Chapter 13 Plan (Select A. or B.):

A.   X   post-confirmation;

B.        pre-confirmation (Select i. or ii.);

i.        Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)). Therefore, this notice and the Attached Amended Chapter 13 plan will only be electronically sent to the Office of the United States Trustee and the Chapter 13 Trustee.; or

ii.        Debtor's attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are:

3. The Proponent wishes to modify the Chapter 13 Plan to do the following:  
Lower the Chapter 13 payments and keep the 100% plan feasible.

4. The reason for the modification is: The Debtor is having difficulty making the Chapter 13 payments considering his budget.

5. Select A or B.

A.   X   The Chapter 13 Plan confirmed August 11, 2013 is modified as follows:  
Chapter 13 Plan payment will be \$1,300.00 per month for the remainder of the 60 month Plan.

B.        The unconfirmed Chapter 13 Plan dated        is modified as follows:

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Dated: at Racine, Wisconsin this 10th day of February, 2014.

Servantez Law Office, S.C.  
Attorney for the Debtor

/s/

  
Felix Servantez

State Bar No.:1001444

Servantez Law Office, S.C.  
4101 Washington Avenue  
Racine, WI 53405  
(262) 634-1529 Phone  
(262) 637-4580 Fax

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

In re: Paul P Tadder

Case No: 13-20574

Debtor

Chapter 13

CERTIFICATE OF SERVICE


STATE OF WISCONSIN

RACINE COUNTY

Nancy Emmons being first duly sworn on oath, deposes and states that on the 10<sup>th</sup> day of February, 2014, she deposited in the United States Mail at Racine, Wisconsin, a true and correct copy of the attached **NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN** to the following pre-stamped envelopes addressed to the following: See exhibit #1

/s/   
Nancy Emmons

Subscribed and sworn to before me  
this 10<sup>th</sup> day of February, 2014

/s/   
Felix Servantez  
Notary Public/ State of Wisconsin  
My Commission: permanent

Servantez Law Office, S.C.  
4101 Washington Avenue  
Racine, WI 53405  
(262) 634-1529 Phone  
(262) 637-4580 Facsimile

EXHIBIT 1

Label Matrix for local noticing  
0757-2  
Case 13-20574-pp  
Eastern District of Wisconsin  
Milwaukee  
Mon Feb 10 13:42:37 CST 2014

Bayview Loan Servicing, LLC  
c/o Blommer Peterman, SC  
165 Bishops Way, Suite 100  
Brookfield, WI 53005-6215

JPMorgan Chase Bank, National Association  
c/o Gray & Associates, LLP  
16345 W Glendale Dr  
New Berlin, WI 53151-2841

BAC Home Loans  
P.O. Box 5170  
Simi Valley, CA 93062-5170

Bank of America, N.A.  
P.O. Box 660933  
Dallas, TX  
75266-0933

Bayview Loan Servicing, LLC, a Delaware Limi  
4425 Ponce De Leon Blvd., 5th Floor  
Coral Gables, FL 33146-1837

Dyck Oneal Inc  
15301 Spectrum Dr  
Addison, TX 75001-6436

Green Tree Servicing, LLC  
PO BOX 0049  
Palatine, IL 60055-0049  
Telephone number: 888-298-7785

Jane Nikolai  
Racine Co. Treasurer  
730 Wisconsin Avenue  
Racine, WI 53403-1269

Monco Law  
P.O. Box 1641  
RE: Tri City National Bank  
Brookfield, WI 53008-1641

Bank of America, N.A.  
c/o Prober & Raphael, ALC  
20750 Ventura Blvd, Ste 100  
Woodland Hills, CA 91364-6207

(p)GREENTREE SERVICING LLC  
BANKRUPTCY DEPARTMENT  
P O BOX 6154  
RAPID CITY SD 57709-6154

Nationstar Mortgage, LLC.  
PO Box 630267  
Irving, TX 75063-0116

BAC Home Loans  
P.O. Box 650070  
Dallas, TX 75265-0070

Bayview Loan Servicing  
4425 Ponce DeLeon Blvd 5th Floor  
Miami, FL 33146-1837

CHASE  
P.O. Box 9001871  
Louisville, KY 40290-1871

Federal National Mortgage Association  
Vantium Capital, Inc.  
7880 Bent Branch Dr., Suite 150  
Irving, TX 75063-6045

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Mid Americ  
55th & Holmes  
Claredon Hills, IL 60514

(p)NATIONSTAR MORTGAGE  
PO BOX 630267  
IRVING TEXAS 75063-0116

Bank of America, NA  
c/o Gray & Associates, LLP  
16345 W Glendale Dr  
New Berlin, WI 53151-2841

JPMorgan Chase Bank, N.A.  
c/o Bass & Moglowsky SC  
501 W. Northshore Dr., #300  
Milwaukee, WI 53217-4541

All Saints  
P.O. Box 68-9872  
Milwaukee, WI 53268-0001

BANK OF AMERICA, N.A  
c/o Gray & Associates, L.L.P.  
16345 West Glendale Drive  
New Berlin, WI 53151-2841

Bayview Loan Servicing, LLC, a Delaware Limi  
4425 Ponce De Leon Blvd.  
Coral Gables, FL 33146-1837

Department of the Treasury  
Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Gecrb/Sams  
Po Box 981400  
El Paso, TX 79998-1400

JPMorgan Chase Bank, N.A.  
Chase Record Center  
Attn: Correspondence Mail  
Mail Code LA4-5555  
700 Kansas Lane  
Monroe, LA 71203-4774

MidAmerica Bank- PNC Bank  
Attn: Jeffery Schuster  
633 West Wisconsin Ste.1800  
Milwaukee, WI 53203-1918

Office of the U. S. Trustee (e)  
517 East Wisconsin Ave.  
Room 430  
Milwaukee, WI 53202-4510

PNC BANK  
PO BOX 94982  
CLEVELAND, OH 44101-4982

Pnc Bank  
1001 S Washington St  
Naperville, IL 60540-7400

Racine County Treasurer  
730 Wisconsin Ave.  
Racine, WI 53403-1269

Rmb, Inc  
409 Bearden Park Cir  
RE; First National Bank of Omaha  
Knoxville, TN 37919-7448

St Frns Bk  
142 W Wisconsin Av  
Milwaukee, WI 53203-2507

TDS Metrocom  
6425 Odana Road  
Madison, WI 53719-1127

The Bank of New York Mellon, et al  
c/o Prober & Raphael  
Attorney for Secured Creditor  
P.O. Box 4365  
Woodland Hills, CA 91365-4365

Time Warner Cable  
P.O. Box 3237  
Milwaukee, WI 53201-3237

WI Dept Of Revenue  
P.O.Box 8906  
Madison, WI 53708-8906

We Energies  
Attn Bankruptcy Dept RM A130  
333 W Everett St  
Milwaukee WI 53290-0002

We Energies  
P.O. Box 2089  
Milwaukee, WI 53201-2089

Wff Cards  
3201 N 4th Ave  
Sioux Falls, SD 57104-0700

Wisconsin Department of Revenue  
Attn: Special Procedures, MS 4-SPU  
PO BOX 8901  
Madison WI 53708-8901

Felix Servantez (e)  
Servantez Law Office, S.C.  
4101 Washington Avenue  
Racine, WI 53405-2810

Mary B. Grossman (e)  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203-0161

Paul P Tadder  
1418 Chatham Street  
Racine, WI 53402-4942

(e) electronically

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

GREEN TREE SERVICING LLC  
P.O. BOX 6154  
RAPID CITY, SD 57709-6154

(d)Green Tree Servicing LLC  
P.O. Box 6154  
Rapid City, SD 57709-6154

IRS  
P.O. Box 219236  
Kansas City, MO 64121

Nationstar Mortgage, LLC  
350 Highland Drive  
Lewisville, TX 75067

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Chase  
P.O. Box 9001871  
Louisville, KY 40290-1871

End of Label Matrix	
Mailable recipients	45
Bypassed recipients	1
Total	46